

General

Seneca Privacy Policy

31 October 2022





Background and purpose

Seneca Financial Solutions Pty Ltd ABN 17 610 665 711 (“**Seneca**”, “**we**” or “**us**”) may collect, store, use and disclose personal information in the course of operating our business, including where we act as operator of a Managed Discretionary Account Service (**Service**) or where we manage client investments pursuant to individual mandates or instructions.

This Privacy Policy sets out how and why Seneca will collect, store, use and disclose your personal information.

By visiting our website, applying for investment in our Service, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled and dealt with by us as set out in this Privacy Policy.

1.0 Revisions to this Privacy Policy

Seneca may update this Privacy Policy from time to time so please review our website periodically for changes to it.

Your continued use of our services (including online services),

requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

2.0 What personal information does Seneca collect

Seneca collects personal information as is necessary to assist us in providing our services to our clients and to conduct our investment management business.

The types of personal information Seneca collects will depend on our particular interaction or dealing with you.

Seneca generally collects personal information such as name, phone numbers, address, email address, banking details, date of birth, country of residence, investment details, taxation details (including Tax File Number) and other accounting, audit and financial services related information.

Seneca will not generally collect or hold sensitive information about you, unless we are required to do so by law. Sensitive information includes information about your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions or health information.

If you provide us with personal information that we have not requested (unsolicited personal information) we will, unless otherwise required or permitted by law, delete or destroy it as soon as possible after receiving it.

In certain circumstances we may be required or permitted by law or Court or Tribunal order to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, business name (if any), directorship appointments (if any) and other types of personal information required by law, including (but not limited to) information required under the following:

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and Anti Money Laundering and Counter Terrorism Financing Rules Instrument 2007 (“AML/CTF Laws”).
- Income Tax Assessment Act 1997/ Tax Administration Act 1953.
- Foreign Account Tax Compliance Act (“FATCA”).

You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide our services or assistance to you, may not be able to accept or process an application for investment with or through us or may otherwise be limited in the services, information or benefits we can provide to you.



3.0 How does Seneca collect personal information?

Seneca may collect your personal information in various ways, including via telephone, our website, email or hardcopy and/or online forms. In most situations, we collect your personal information directly from you or from the investment platform which you use.

However, we may also collect information from third parties, such as any administrator, manager or registry services provider appointed by us in respect of the Service, your financial adviser/planner and/or anyone you have authorised to deal with us on your behalf.

Depending on the type of service you have requested, we may also seek to collect information about someone else from you (for example, details of the members of your company/fund or your employees/ contractors). However, you must not provide us with personal information about another person unless you have clear consent from that person to do so, have told them that their personal information will be handled in accordance with this Privacy Policy and where they can find it.

On all occasions personal information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

4.0 Why does Seneca collect and use personal information?

Seneca collects, holds and uses personal information for the purposes for which it was collected (which will normally be obvious at the time of collection or will be notified at the time of collection), related purposes or as permitted or required by law. Without limiting the above, Seneca will collect and use personal information for the purpose of:

- providing you with information you request about us or our investment services;
- processing any application you make for investment with us;
- establishing, maintaining and administering your investment;
- the provision to you of our investment services or any other services we provide from time to time;
- conducting verifications, monitoring and reporting required under the AML/ CTF Laws;
- recording tax information such as TFN, ABN, country of residence in order to report to the ATO (and other relevant bodies as required by law) and withhold tax correctly from payments;
- communicating with you regarding the status of your

investment with us;

- processing authorised payments to and from you;
- quality assurance and training purposes; and
- any other uses identified at the time of collecting your personal information.

In addition to the purposes set out above, Seneca may collect, hold, use and disclose your personal information to inform you of products, services or offers of Seneca which may be of interest to you. Where you are an investor with us, this may include providing you with direct marketing information regarding investment products or services of Seneca. If you do not want to receive this information or do not want Seneca to use or disclose your personal information for direct marketing purposes, you can opt out at any time by contacting Seneca using the contact details set out below or by using any opt out facility in the relevant communication.



5.0 Who does Seneca disclose personal information to?

Any personal information provided to us may be disclosed, if appropriate, to other entities in order to facilitate the purpose for which the information was collected or the other purposes outlined in paragraph 4 above. Such entities generally include:

- the Australian Taxation Office for the purpose of legislative compliance and reporting;
- the Australian Securities and Investments Commission (ASIC), for the purpose of legislative compliance and reporting;
- third party service providers for the purpose of enabling them to provide a service such as unit registry, administration, audit and tax and secure storage and archiving services or manage a product;
- related companies of Seneca (such as subsidiaries or holding companies of Seneca);
- any administrator appointed by us in respect of the Service from time to time, or any platform provider you use for management of your investments;
- your personal financial advisor / planner or legal adviser and their service providers (if you have provided consent for such disclosure) for the purpose of managing your investment in our Service or our provision of services to you;
- government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law;
- other entities if you have given your express consent; and
- any other entities identified at the time of collecting your personal information or to which we are legally

6.0 How does Seneca protect personal information?

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures:

- security procedures for access to our business premises;
- security procedures within our offices;
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring; and
- mandatory confidentiality guidelines for all staff within the business (as outlined in employment contracts).
- However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information.

You must take care to protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.



7.0 Links to third party websites

Our website may contain links to the websites of other entities. If you click on such links, you will be transferred to the website of these entities. Seneca has no control over, and is not responsible for, the privacy practices of these entities. You should read the privacy policy of these entities to find out how they handle your personal information when you visit their websites.

8.0 Accessing your personal information held by Seneca

You have the right to request access to the personal information we hold about you. Where you make such a request, you may access personal information we hold about you, subject to a small number of legal restrictions or exemptions. Where such restrictions or exemptions exist we will advise you of those reasons at the time of your request or as soon as possible after you make the request.

You also have the right to request correction of any personal information we hold about you.

If you wish to access the personal information we hold

about you or request correction of it, you should contact our Compliance Manager using the contact details below.

While we do not charge you requesting access to your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for time and cost in the following circumstances:

- if an extended amount of time is required to collate and prepare material for you; and
- if you wish to have your files photocopied for you.

9.0 How can you correct and update your information?

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information.

Please contact us using the contact details below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date so that we can update your file accordingly.

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10.0 What do you need to do if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles under the Privacy Act 1988 (Cth) you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to our Compliance Officer who will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. We will aim to respond to and notify you of the outcome of our investigation regarding privacy complaints within 30 days of receiving the complaint.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

11.0 Contact Us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact our Compliance Officer using the following contact details.

The Privacy Officer
Level 4, 125 Flinders Lane
Melbourne VIC 3000
T +61 3 8639 1603